

Caroline Janzen, OSB #176233
caroline@ruggedlaw.com
Paul Janzen, OSB #176240
paul@ruggedlaw.com
RUGGED LAW, INC.
4550 SW Hall Blvd
Beaverton, OR 97005
Phone: 503-520-9900
Fax: 503-479-7999
Attorney for Plaintiffs

IN THE FEDERAL DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JASMINE ELLIS, an Individual,
TYREL BEERY, an Individual,
MICHELLE LIEBE, an Individual,
JENNIFER (RUBY) CHAVEZ, an Individual,
JILL BRANDT, an Individual,
ELIZABETH TARRIES an Individual

Plaintiff,

v.

OREGON HEALTH AND SCIENCE
UNIVERSITY, an independent public
corporation,

Defendant.

Case No. 3:23-CV-01555-JR

DECLARATION OF COUNSEL IN
SUPPORT OF RESPONSE TO MOTION TO
COMPEL

I, Paul Janzen, Counsel for Plaintiffs, declare as follows:

1.

I am an attorney licensed to practice law in the State of Oregon and am the attorney of record representing Plaintiff Beery in the above-captioned case. I make this declaration based on my own personal knowledge.

2.

Attached as Exhibit 1 is a copy of an email showing that our office has produced all required documents and discovery pleadings requested by defendant in its motion to compel.

3.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 28th day of March, 2025.

RUGGED LAW, INC.

By /s/ Paul Janzen

Paul Janzen, OSB No. 176240

paul@ruggedlaw.com

Caroline Janzen, OSB No. 176233

caroline@ruggedlaw.com

Attorneys for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing pleading on all counsel of record on the date set forth below via the Court's CM/ECF filing system.

DATED this 28th day of March, 2025.

RUGGED LAW, INC.

By /s/ *Paul Janzen*

Paul Janzen, OSB No. 176240

paul@ruggedlaw.com

Caroline Janzen, OSB No. 176233

caroline@ruggedlaw.com

Attorneys for the Plaintiff